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UNITED STATES BANKRUPTCY COURT

DISTRICT OF OREGON

In re:

ECOCAB PORTLAND, LLC

Alleged Debtor.

Case No. 17-31000-tmb7

MOTION FOR ENTRY OF ORDER  
RELEASING FUNDS TO PETITIONING  
CREDITORS

Petitioning Creditors Paul Bernal (“Bernal”), Dan Davis (“Davis”), and John McRoberts (“McRoberts”) (collectively the “Petitioning Creditors”), hereby move the Court (the “Motion”) for the entry of an Order withdrawing the funds on deposit with the court, pursuant to LBR 7067-1(d).

In support of this motion, Petitioning Creditors assert the following:

1. Petitioning Creditors filed an Involuntary Petition for EcoCab Portland, LLC on March 23, 2017 (the “Company”).
2. On March 31, 2017, Petitioning Creditors filed a Notice of Indemnity Bond with the court (Dkt. #18) and deposited \$5,000.00 with the court (Dkt #19).

3. Amy Mitchell is the duly appointed Chapter 7 trustee in this matter, and the \$5,000.00 bond deposit that was made to the court by Petitioning Creditors is no longer necessary.

4. The funds in their entirety should be disbursed to “Vanden Bos & Chapman Lawyers Trust Account fbo Ron Knori” and sent to Douglas R. Ricks, Vanden Bos & Chapman LLP, 319 SW Washington St., Suite 520, Portland, OR 97204.

5. Pursuant to LBR 7061-1(d), Ron Knori’s address is 58 Longview Heights Place, Longview, WA 98632.

WHEREFORE, the Petitioning Creditors respectfully request that the court enter an order releasing the funds as described in this Motion.

Dated: June 16, 2017

/s/ Troy G. Sexton  
Troy G. Sexton, OSB #115184  
Of Attorneys for Petitioning Creditor

## CERTIFICATE OF SERVICE

I, Troy G. Sexton, hereby certify that on June 16, 2017, I served, by first class mail, a full and true copy of the foregoing MOTION FOR ENTRY OF ORDER RELEASING FUNDS TO PETITIONING CREDITORS on the following by causing a copy thereof to be placed in a sealed envelope, postage prepaid, addressed as shown below, in the U.S. Mail at Portland, Oregon:

Brian Conway  
15 Elvis Blvd  
Chester, NY 10918

EcoCab Portland, LLC  
3250 NW Yeon Ave.  
Portland, OR 97210

Oregon Dept of Labor and Industries  
Bernadette Yap-Sam (Ref 17-0601)  
1400 Executive Pkwy #200  
Eugene, OR 97401

Joshua D. Stadler  
851 SW 6th Avenue #1500  
Portland, OR 97204

Additionally, I certify that on June 16, 2017, a full and true copy of the foregoing MOTION FOR ENTRY OF ORDER RELEASING FUNDS TO PETITIONING CREDITORS was serviced on the following recipients electronically via ECF:

- MICHELLE M BERTOLINO   mbertolino@fwwlaw.com, kmuir@fwwlaw.com;ngrimes@fwwlaw.com;lsei@fwwlaw.com
- MARK B COMSTOCK   mcomstock@ghrlawyers.com, jdavison@ghrlawyers.com;tbrinlee@ghrlawyers.com
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beldingt@lanepowell.com;docketing-pdx@lanepowell.com;barkerd@lanepowell.com
- US Trustee, Portland    USTPRegion18.PL.ECF@usdoj.gov

Dated: June 16, 2017

/s/ Troy G. Sexton

Troy G. Sexton